

**FILED**

UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

DEC 16 2024

FOR THE DISTRICT OF NEW MEXICO:

MITCHELL R. ELFERS  
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

**VS.**

**ANGELICA DOMINGUEZ,**

Defendant.

Criminal No. 24-186 MLC

**Counts 1-7: 18 U.S.C. § 1344(2): Bank Fraud.**

## INFORMATION

Counts 1 through 7

1. From on or about January 6, 2020, and continuing to on or about August 19, 2022, in Sandoval, Santa Fe, and Rio Arriba Counties, in the District of New Mexico, and elsewhere, the defendant, **ANGELICA DOMINGUEZ**, and Billie Jo Gussler, knowingly executed and attempted to execute a scheme and artifice to obtain money and property under the custody and control of Del Norte Credit Union, Bank of America, N.A., U.S. Bank, N.A., Century Bank, Enterprise Bank and Trust, Washington Federal Bank, and SoFi Bank, N.A., financial institutions within the meaning of 18 U.S.C. § 20, by means of false and fraudulent pretenses, representations, and promises, namely through the use of fraudulent check transactions.

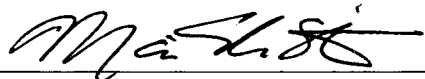
2. It was a part of the scheme and artifice that the defendant, **ANGELICA DOMINGUEZ**, and Billie Jo Gussler, would obtain stolen mail, to include negotiated checks, which would allow them to alter said checks so that those checks would pay funds to the defendant and Billie Jo Gussler instead of the intended recipients.

3. On the date set out below, within the District of New Mexico, and elsewhere, the defendant, **ANGELICA DOMINGUEZ**, and Billie Jo Gussler, for the purpose of executing and in order to effect the above-described scheme and artifice to obtain money and property owned by, or under the custody and control of financial institutions, conducted the following fraudulent transactions:

<u>Count</u>	<u>On or About Date</u>	<u>Approximate Amount</u>	<u>Victim</u>	<u>Check No.</u>	<u>Financial Institution</u>
1	January 31, 2020	\$433.80	J.H.	1764	U.S. Bank
2	February 26, 2020	\$1,488	S.F.O.S. LLC	8992	Bank of America
3	March 2, 2020	\$1,488	S.F.O.S. LLC	8994	Bank of America
4	May 18, 2020	\$24,400	T.C.I.	60186	Washington Federal Bank
5	May 31, 2021	\$75	J.G.	193	SoFi Bank
6	June 1, 2021	\$75	J.G.	185	SoFi Bank
7	June 4, 2021	\$75	J.G.	190	SoFi Bank

In violation of 18 U.S.C. § 1344(2).

ALEXANDER M.M. UBALLEZ  
United States Attorney

  
\_\_\_\_\_  
MARIA ELENA STITELER  
Assistant United States Attorney  
201 Third Street NW, Suite 900  
Albuquerque, New Mexico 87102  
(505) 346-7274